

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: DeAnndra Lechel Burton, Debtor

**Case No. 22-00255-KMS
CHAPTER 13**

MOTION TO INCUR NEW DEBT

COMES NOW, Debtor, by and through counsel, and moves this Court to allow Debtor to incur new debt, and in support thereof, would show the Court as follows:

1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on February 10, 2022.
2. Debtor is paying approximately 0% to General Unsecured Debts through the plan.
3. Debtor does not currently own a vehicle and has been relying on her mother's vehicle to commute to and from work. She is no longer able to use her mother's vehicle and needs to obtain her own.
4. A Supplemental Schedule I and J (Dk #67) has been filed evidencing debtor's current income and expenses and demonstrating her ability to make the proposed direct payments for the vehicle loan.
5. Debtor wishes to borrow up to \$30,000.00 to purchase a vehicle with an interest rate not to exceed 20.00% and monthly payments not to exceed \$550.00. Debtor will make payments directly to the lender in accordance with the terms of the loan agreement.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)
The Rollins Law Firm, PLLC
P.O. Box 13767
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601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Motion to Incur Debt was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.